

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

IN RE:	:	CHAPTER 13
TIMOTHY LEE WILKINSON	:	
	:	
	:	CASE NO. 1:19-bk-03021
CHRISTINE MARIE WILKINSON	:	
Debtors	:	
	:	
	:	
Wells Fargo Bank, N.A., d/b/a Wells	:	
Fargo Auto	:	
Movant	:	
	:	
TIMOTHY LEE WILKINSON	:	
	:	
	:	
CHRISTINE MARIE WILKINSON	:	
Respondents	:	
	:	
	:	

ANSWER TO MOTION FOR RELIEF FROM STAY

1. Admitted.
2. Admitted.
3. Admitted.
4. Admitted.
5. Admitted.
6. Admitted.
7. Admitted. According to Movant's value and pay off, Movant is protected by an equity cushion of approximately \$8,541.80.
8. Admitted.
9. Admitted that the Debtors missed payments; however, they are checking their records to determine whether they had made post-petition payments. Both debtors experienced deaths of close family members after their case was filed and this year suffered material financial hardships due to COVID 19. They intend to pay the amount owed through an amended plan.
10. Admitted.
11. Admitted.

12. Admitted.
13. Debtors intend to amend the plan and therefore this is denied. See response to paragraph 9.
14. Admitted that the Debtors missed payments; however, they are checking their records to determine whether they had made post-petition payments
15. Admitted that the note matured; however, Movant's proof of claim indicates a higher amount is owed than the motion. If no post-petition payments were made, then one of the figures apparently is incorrect and therefore the debtors are uncertain of the outstanding balance and deny the paragraph to that extent.
16. Denied. According to Movant's value and pay off, Movant is protected by an equity cushion of approximately \$8,541.80.
17. Denied. According to Movant's value and pay off, Movant is protected by an equity cushion of approximately \$8,541.80.

WHEREFORE, the Debtors respectfully request that this Court deny the motion for relief filed by the Movant and grant such other relief as this Court deems just.

Respectfully submitted,

/s/ Kara K. Gendron
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